

**TODD****PACIFIC SHIPYARDS CORPORATION****Seattle Division: P. O. Box 3806, Seattle, Washington 98124 Tel. 623-1635 (Area Code 206)**

October 17, 1986

Lori Cohen  
U.S. Environmental Protection Agency  
Superfund Branch  
1200 Sixth Avenue, M/S 525  
Seattle, Washington 98101

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Superfund Branch

**Re: Harbor Island; Section 104 Request**

Dear Ms. Cohen:

The following shall constitute our response to your CERCLA Section 104 request regarding Harbor Island.

1. See Todd letter of August 21, 1986.
  2. The generic names and chemical character of the hazardous substances generated and handled at our site are maintained in:
    - a. Material Safety Data Sheets (approximately 1000) mandated by 29 CFR 1910.1200; OSHA Hazard Communication Standard.
    - b. Generator Annual Dangerous Waste reports mandated by the Resource Conservation and Recovery Act and submitted to the State Department of Ecology in Olympia - Hazardous Waste Section.
- (Due to the amount of information involved, it will be made available for your review at our facility at a mutually convenient time).
3. The materials identified in response to your question number two are handled in accordance with Todd's Seattle Shipyard "Hazardous Substance Control Procedure" (copy enclosed). In regards to quantification of those materials, normal business purchase requisitions are available, however no method for determining quantities based on ultimate waste streams and mixture of materials has been established. Estimates for selected categories of potential air contaminants related to our processes may be found as part of our annual report to the Puget Sound Air Pollution Control Agency,
  4. New material has been stored throughout the yard facility. On site temporary storage of hazardous wastes has been restricted to the southeast section of the yard and adjacent leased property from Texaco. Hazardous waste materials has been disposed of at Western Processing in Kent, CSSI in Arlington, Oregon, and ESI in Idaho. All three final disposal sites may be found on our annual generator reports since the implementation of RCRA.

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5. All hazardous substances hauled from the Todd facility was accomplished by:

- a. Northwest Tank Service (Northwest EnviroService, Inc.)  
1500 Airport Way South  
Seattle, WA
- b. Chemical Processors & subsidiaries Resource Recovery and United  
Drain Oil  
5501 Airport Way South  
Seattle, WA
- c. Liquid Waste, Inc. (no longer in business)
- d. Crosbey-Overton Inc.  
20245 76th Avenue South  
Kent, WA

6. Documented information regarding spills in and around our site may be found as part of the U.S. Coast Guard's records on "oil spills" Quantity, type of material, clean measures taken, cause, and other related information are part of this report. No other documentation of spills of hazardous substance were found during our search.

7. Environmental Investigations:

- a. During the 1975-1977 installation of the "side building ways" located in the N.E. corner of Todd property, oil was observed floating on top ground water. A recovery well was installed to remove oil contaminants and remained in place for a period of two years. After observation of no further oil contamination, the well was discontinued in 1986.
- b. The 1980 installation of an electrical vault by Building T-114 resulted in discovery of "oil type" products flowing into the excavated area. Todd notified Seattle Fire Department, who in turn notified the EPA. Results of this investigation can be found in EPA files. (sample results attached).
- c. In 1986, in conjunction with the implementation of Underground Storage Tank Regulations, preliminary sampling was conducted of tanks at our facilities, (results attached). After evaluation of the data, tank removal was conducted for those tanks showing potential leakage. The Department of Ecology was notified and conducted an inspection of the area in question. We are presently working with DOE on further evaluation of the area.

8. Refer to the response to Questions #7a.

9. See Todd letter of August 21, 1986.

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10. Todd has taken a position with it's general liability carrier that coverage should be provided under that policy. The carrier has entered a reservation of rights while the matter is investigated. The policy will be made available for EPA's review at a mutually convenient time.

If clarification or additional information is necessary, please contact me at your convenience.

Very truly yours,

TODD PACIFIC SHIPYARDS CORPORATION  
Seattle Division

A handwritten signature in blue ink, appearing to read "Michael G. Marsh".

Michael G. Marsh  
Attorney

MGM:lbt